

## **REMARKS**

In the Final Office Action mailed February 27, 2008, claims 39 and 42-70 are pending and stand rejected. Claims 39 and 42-70 stand rejected under 35 U.S.C. 103(a) over USPN 6,097,371 ("Siddiqui") in view of USPN 5,530,865 ("Owens"). Applicant traverses the rejections.

As an initial matter, the cover page for the Final Action indicates that the drawings are objected to. However, the Final Action fails to identify any specific objections to be remedied. Applicant requests that if the Examiner maintains this objection, that any subsequent action specify the nature of the objections so that the Applicant can address them.

### **The Pending Claims Patentably Distinguish Over the Cited References**

In making a rejection under § 103, according to MPEP § 2142, "The examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness." To make out such a *prima facie* case, "all the limitations of a claim must be considered when weighing the differences between the claimed invention and the prior art in determining the obviousness of a process or method claim. See MPEP § 2143.03" MPEP § 2116.01 (emphasis in original). The Final Action fails to address several of the explicitly recited limitations of independent claim 39, as demonstrated below.

As specific examples, the Final Action fails to address the explicitly recited step in claim 39 of generating a screen document by aggregating the internal representations of a graphical tool and at least one content document. Similarly, the Action fails to address the explicitly recited limitation that the common format used for the internal representations of the content documents and the graphical tool is a format other than the file formats associated with the respective application programs that are associated with the content documents and that the internal representation describes the respective documents as collections of objects and parameters defining properties of the objects within each document. The Action ignores these limitations altogether. Thus, the Action fails to set forth a *prima facie* case of obviousness with respect to independent claim 39.

Moreover, Applicant traverses the assertions in the Final Action with respect to the elements of claim 39 that were addressed. For example, independent claim 39 recites a) the receipt and

subsequent translation of content documents into a common format other than formats associated with the application programs corresponding to the content documents, and b) the provision of information about a graphical tool in the internal representation used to describe the content documents. The Final Action asserts that this subject matter is not recited in the claims.

Applicant disagrees. The translation of content documents is recited in element (ii) of claim 39 in the form of deriving internal representations of the plurality of content documents. The claim explicitly recites that the internal representations are in a common format other than the file formats associated with the respective application programs. As the internal representations are in a format other than the format associated with the application with which the content documents are associated, derivation of such a representation necessarily includes translation. Element (iii) of claim 39 explicitly recites that the document tool file stores information about the graphical tool in the internal representation used to describe the plurality of content documents. Thus, the information about the graphical tool is stored in a format common to the internal representations of the content documents.

In addition, Siddiqui and Owens, individually and in combination, fail to describe, teach, or suggest the recited derivation/translation process that results in internal representations of content documents in a format other than the file formats associated with the application programs that correspond to the respective content documents. The Final Action concedes that Siddiqui fails to describe, teach, or suggest providing a plurality of content documents in a common format. The Final Action suggests, however, that Owens describes a portion of this subject matter at column 9, lines 32-39 (i.e., the use of a common format for content documents). Owens relates to systems and methodology for dragging and dropping content among application windows. The cited passage states, as indicated in the Final Action, that if, when attempting to drag and drop content from an application in a first window to an application in another window, the applications fail to share a common format, the process is aborted and feedback will be provided to the user. This passage, instead of describing deriving an internal representation of content documents into a common format as is recited in the claim, suggests that the clicking and dragging described in Owens will not work if the documents do not share a common native format.

Moreover, independent claim 39 does not merely recite the provision of documents in a common format, as the Final Action implies. To the contrary, independent claim 39 recites deriving internal representations of content documents in a common format and using the internal representations to generate a screen document to render to a display. The Final Action does not even attempt to identify where either reference describes, teaches, or suggests this subject matter. Thus Owens fails to cure the deficiencies of Siddiqui.

For at least these reasons, Applicant requests reconsideration and withdrawal of the § 103 rejections of independent claim 39. Claims 42-70 depend on claim 39, and add further limitations thereto. Applicant therefore requests reconsideration and withdrawal of the § 103 rejections of these claims, too.

In addition, certain ones of claims 42-70 recite additional subject matter that further distinguishes over the cited references. For example, claim 46 recites that the tool code associated with the tool document file processes the internal representation of the at least one content document. In rejecting claim 46, the Final Action appears to rely upon general descriptions of manipulating documents using cursors or scroll bars. However, the claim explicitly recites processing the internal representation of a content document, which as recited in independent claim 39, is in a format other than the format associated with an associated application. The passages cited with respect to claim 46 fail to disclose, teach, or suggest this subject matter. Applicant therefore requests reconsideration and withdrawal of the § 103 rejections of claims 46 and 47-48, which depend on claim 46 and add further limitations thereto.

Claim 47 recites that the derived document recited in claim 46 is changed according to a contextual relationship among the graphical tool, the content document, and an application program. In rejecting this claim, the Final Action makes reference to changes in document navigation based on processor speed and available memory. The Final Action also refers to the use of a particular navigation tool, a roller, that provides "intuitive" and "visceral" incremental navigation. None of these descriptions, however, constitute contextual relationships among a graphical tool, a content document, and an application program, as recited in claim 47. Applicant therefore requests

reconsideration and withdrawal of the § 103 rejections of claims 47 and claim 48, which depends on claim 47 and adds further limitations thereto.

Claim 52 recites that rendering the screen document includes generating a view of the screen document expressed in terms of primitive figures and parameters. The Final Action suggests that Siddiqui describes this subject matter because it includes screen shots with different shapes and different parameters. The screen shots, however, do not describe, teach, or suggest, how the objects within the screen are expressed within a document processing system. For example, the system in Siddiqui may only express the screen as rows of individual pixels of various colors and intensities, without regard to the discrete figures the human brain will detect in those rows of pixels. Claim 52, on the other hand, explicitly recites that the screen document is expressed in terms of primitive figures and parameters. The Final Action fails to indicate whether Siddiqui describes this subject matter. The Final Action's rejection of claims 53-56 is likewise faulty. Applicant therefore requests reconsideration and withdrawal of the § 103 rejections of claims 52-56.

Claim 57 recites that rendering the screen document comprises receiving a view control input that defines a viewing context and related temporal parameters. The Final Action asserts this subject matter is disclosed in column 16, lines 17-22. This passage describes that an operating system can generate multiple windows and that it can maintain message queues for each application. The passage is completely silent with respect to the use of temporal parameters or viewing contexts to render a screen document as expressly recited in claim 57. Applicant therefore requests reconsideration and withdrawal of the § 103 rejections of claim 57 and claims 58-60, which depend on claim 57 and add further limitations thereto.

Claim 70 recites that generating the internal representations of the plurality of content documents includes selecting the objects used to describe the respective content documents from a common library of document objects. The Final Action, in rejecting this claim, merely refers to Figure 4C and states that the reference teaches an internal representation of a graphical display. Figure 4C is a screen shot. It does not disclose a library or any aspect of a process for generating an

internal representation of a content document. Applicant therefore requests reconsideration and withdrawal of the § 103 rejection of claim 70.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 18-1945, under Order No. PGLD-P02-003 from which the undersigned is authorized to draw.

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Respectfully submitted,

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